

ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA :

- v. - :

CHRISTOPHER HAMILTON and  
ROBERT MACDONALD,

Defendants.

SEALED SUPERSEDING  
INDICTMENT

S1 18 Cr. 793 (\_\_\_)

- - - - - X

COUNT ONE

(Conspiracy to Commit Money Laundering)

The Grand Jury charges:

1. From at least in or about 2015 through at least in or about 2016, in the Southern District of New York and elsewhere, CHRISTOPHER HAMILTON and ROBERT MACDONALD, the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit money laundering, in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 1956(a)(2)(B)(i).

2. It was a part and an object of the conspiracy that CHRISTOPHER HAMILTON and ROBERT MACDONALD, the defendants, and others known and unknown, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such financial transactions which in fact involved the

proceeds of specified unlawful activity, to wit, over \$100 million in wire fraud proceeds from a pyramid scheme involving a purported cryptocurrency known as "OneCoin," in violation Title 18, United States Code, Section 1343, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, all in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

3. It was further a part and an object of the conspiracy that CHRISTOPHER HAMILTON and ROBERT MACDONALD, the defendants, and others known and unknown, would and did transport, transmit, and transfer, and attempt to transport, transmit, and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States, and to a place in the United States from and through a place outside the United States, knowing that the monetary instrument and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, to wit, over \$100 million in wire fraud proceeds from a pyramid scheme involving a purported

cryptocurrency known as "OneCoin," in violation Title 18, United States Code, Section 1343, all in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i).

(Title 18, United States Code, Section 1956(h).)

COUNT TWO

(Conspiracy to Commit Wire Fraud)

The Grand Jury further charges:

4. In or about 2016, in the Southern District of New York and elsewhere, CHRISTOPHER HAMILTON and ROBERT MACDONALD, the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to violate Title 18, United States Code, Section 1343.

5. It was a part and an object of the conspiracy that CHRISTOPHER HAMILTON and ROBERT MACDONALD, the defendants, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, HAMILTON

and MACDONALD falsely represented to others that they would assist in transferring from China to the United States approximately \$40 million in proceeds from a pyramid scheme involving a purported cryptocurrency known as "OneCoin," and subsequently stole millions of dollars of those funds by transferring the money to bank accounts controlled by HAMILTON and MACDONALD in other Asian and European countries.

(Title 18, United States Code, Section 1349.)

FORFEITURE ALLEGATIONS

6. As a result of committing the money laundering offense alleged in Count One of this Indictment, CHRISTOPHER HAMILTON and ROBERT MACDONALD, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offense, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense.

7. As a result of committing the wire fraud offense alleged in Count Two of this Indictment, CHRISTOPHER HAMILTON and ROBERT MACDONALD, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461,

any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense.

Substitute Asset Provision

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

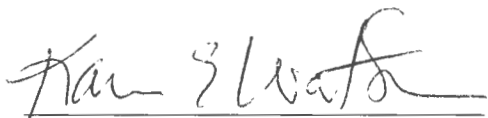
d. has been substantially diminished in value;  
or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property

of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981 and 982;  
Title 21, United States Code, Sections 853; and  
Title 28, United States Code, Section 2461.)

  
FOREPERSON

  
GEOFFREY S. BERMAN  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SEALED SUPERSEDING INDICTMENT

S1 18 Cr. 793 (\_\_\_)

(Title 18, United States Code,  
Sections 1956(h) and 1349)

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GEOFFREY S. BERMAN  
United States Attorney.

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A TRUE BILL

Foreperson.



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3/21/19 FILED INDICTMENT WARRANT ISSUED

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